

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	BKRTCY. NO. 16-07979 MCF
ESPERANZA DE LA CRUZ	*	CHAPTER 13
DEBTOR	*	

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COMES NOW, **ESPERANZA DE LA CRUZ** debtor in the above captioned case, through the undersigned attorney and very respectfully states and prays as follows:

1.The debtor is hereby submitting an amended Chapter 13 Plan, dated November 29, 2016, herewith and attached to this motion.

2.The Plan is amended to provide for Empresas Berrios POC #03 (\$1,127.37), to include the correct pre-petition sum owed to RNPM LLC (POC \$11,782.80) , and delete the "tax refund" provision, in above captioned case. All other provisions remain the same.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent regular mail to the debtors and to all creditors and parties in interest appearing on the master address list, hereby attached.

NOTICE

You are notified that within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

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Notice of Amended Chapter 13 Plan
Case no. 16-07979 MCF13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of November, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR PETITIONER/DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

Case No. 3:16-bk-7979

DE LA CRUZ, ESPERANZA

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>11/29/2016</u>	
<input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE		II. DISBURSEMENT SCHEDULE	
$\$ \quad 410.00 \times \quad 60 = \$ \quad 24,600.00$		A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____	
$\$ \quad \quad \times \quad = \$ \quad \quad \quad$		B. SECURED CLAIMS:	
$\$ \quad \quad \times \quad = \$ \quad \quad \quad$		<input type="checkbox"/> Debtor represents no secured claims.	
$\$ \quad \quad \times \quad = \$ \quad \quad \quad$		<input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:	
$\$ \quad \quad \times \quad = \$ \quad \quad \quad$		1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:	
TOTAL: \$ <u>24,600.00</u>		Cr. <u>RNPM LLC</u> Cr. _____ Cr. _____	
Additional Payments:		# <u>61010010036072</u> # _____ # _____	
\$ _____ to be paid as a LUMP SUM		\$ <u>11,782.80</u> \$ _____ \$ _____	
within _____ with proceeds to come from:		2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims:	
<input type="checkbox"/> Sale of Property identified as follows:		Cr. <u>COND. BORINQUEN</u> Cr. <u>EMPRESAS BERRIO</u> Cr. <u>Empresas Berrios</u>	
_____		# <u>C-116</u> # <u>POC #02</u> # <u>POC #03</u>	
<input type="checkbox"/> Other:		\$ <u>4,300.00</u> \$ <u>1,271.75</u> \$ <u>1,127.37</u>	
_____		3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:	
Periodic Payments to be made other than, and in addition to the above:		Cr. _____ Cr. _____ Cr. _____	
\$ _____ x _____ = \$ _____		# _____ # _____ # _____	
PROPOSED BASE: \$ <u>24,600.00</u>		\$ _____ \$ _____ \$ _____	
III. ATTORNEY'S FEES		4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:	
(Treated as § 507 Priorities)		5. <input type="checkbox"/> Other:	
Outstanding balance as per Rule 2016(b) Fee		6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:	
Disclosure Statement: \$ <u>2,735.00</u>		<u>RNPM LLC</u>	
Signed: <u>Esperanza De la Cruz</u>		C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.	
Debtor		11 U.S.C. § 507 and § 1322(a)(2)	
Joint Debtor		D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.	
		1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____	
		<input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____	
		Cr. _____ Cr. _____ Cr. _____	
		# _____ # _____ # _____	
		\$ _____ \$ _____ \$ _____	
		2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
		OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)	

Attorney for Debtor R Figueroa Carrasquillo Law Office PSC

Phone: (787) 744-7699

Label Matrix for local noticing
0104-3
Case 16-07979-MCF13
District of Puerto Rico
Old San Juan
Tue Nov 29 14:57:07 AST 2016

AAA
PO BOX 70101
SAN JUAN, PR 00936-8101

TRM, LLC as servicing agent for RNPM, LLC
c/o WVS LAW LLC
17 MEXICO STREET
SUITE D-1
SAN JUAN, PR 00917-2202

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

COND. BORINQUEN PARK APARTMENTS
GOYCO STREET
CAGUAS, PR 00725

EMPRESAS BERRIOS
PO BOX 674
CIDRA, PR 00739-0674

EOS CCA
700 LONGWATER DR ATT
NORWELL, MA 02061-1624

ER SOLUTIONSS
800 SW 39TH ST SPRINT
RENTON, WA 98057-4975

NATIONWIDE RECOVERY
2304 TARPLEY RD STE 134 ATT MOBILITY
CARROLTON, TX 75006-2467

RNPM LLC
PO BOX 194499
SAN JUAN, PR 00919-4499

TRM LLC
PO Box 192219
San Juan, PR 00919-2219

TRM, LLC Loan Servicing System
221 Ponce Leon Ste 804
San Juan, PR 00918

ALEJANDRO OLIVERAS RIVERA
ALEJANDRO OLIVERAS CHAPTER 13 TRUS
PO BOX 9024062
SAN JUAN, PR 00902-4062

ESPERANZA DE LA CRUZ
BORINQUEN PARK APARTMENTS
APT C 116
CAGUAS, PR 00726

MONSITA LECAROS ARIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)TRM, LLC as servicing agent for RNPM, LLC
c/o WVS LAW LLC
17 MEXICO STREET, SUITE D-1
SAN JUAN, PR 00917-2202

End of Label Matrix
Mailable recipients 15
Bypassed recipients 1
Total 16